

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEVEN LLOYD SADLER and
JENNA M. WHITE,

Defendants.

CASE NO. CR13-0321RSM

**MOTION FOR PRELIMINARY
ORDER OF FORFEITURE**

Note on Motion Calendar:
Friday, March 6, 2015

Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, the United States of America, by and through Annette L. Hayes, Acting United States Attorney for the Western District of Washington, and Matthew H. Thomas, Assistant United States Attorney for said District, respectfully moves this Court for the entry of a Preliminary Order of Forfeiture forfeiting STEVEN LLOYD SADLER and JENNA M. WHITE's interest in the following property:

- a. 2007 BMW 525, bearing Washington license plates: AGB6519, and VIN: WBANE53517CW62462;
- b. Dan Wesson, .45 Caliber Semi-Automatic Pistol, Serial No. MR00954;
- c. \$3,200.00 in U.S. Currency, seized from STEVEN SADLER on July 31, 2013;
- d. \$1,000.00 in U.S. Currency, seized from STEVEN SADLER's residence on July 31, 2013;

1 e. Unused postage stamps seized from STEVEN SADLER's residence on July
2 31, 2013; and

3 f. Vacuum and heat sealing equipment seized from STEVEN SADLER's
4 residence on July 31, 2013.

5 This motion is based upon the guilty pleas of STEVEN LLOYD SADLER and
6 JENNA M. WHITE to violations of Title 21, United States Code, Sections 841(a)(1),
7 (b)(1)(B) and 846, Conspiracy to Distribute Heroin, Methamphetamine and Cocaine, as
8 charged in Count One (1) of the Indictment, Docket Entry No. 10; and upon the Plea
9 Agreements, Docket Entry Nos. 36 & 44, in which the Defendants agree that property
10 encompassing the above-described property is subject to forfeiture as property constituting
11 or derived from, any proceeds Defendants obtained, directly or indirectly, as a result of the
12 above criminal offenses, and that was used, or intended to be used, in any manner or part, to
13 commit, or to facilitate the commission of the charged offenses to which the Defendants
14 have pleaded guilty. *See Id.*

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1 Accordingly, the Court is respectfully requested to enter a Preliminary Order of
2 Forfeiture, forfeiting the Defendants' interest the above-described property to the
3 United States of America. A proposed Preliminary Order of Forfeiture has been submitted
4 herewith.

5 DATED this 25th day of February, 2015.

6 Respectfully submitted,

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8 ANNETTE L. HAYES
Acting United States Attorney

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10 
MATTHEW H. THOMAS
11 Assistant United States Attorney
12 United States Attorney's Office
13 1201 Pacific Avenue, Suite 700
Tacoma, WA 98402
14 Telephone: (253) 428-3800
15 Facsimile: (253) 428-3826
Email: Matthew.H.Thomas@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record for the defendants.

s/ Ellaine M. Wi
ELLAIN M. WI
FSA Paralegal III to
MATTHEW H. THOMAS
United States Attorney's Office
1201 Pacific Avenue, Suite 700
Tacoma, WA 98402
Telephone: (253) 428-3800
Facsimile: (253) 428-3826
E-mail: Ellaine.Wi@usdoj.gov